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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY EARL REGER,

Defendant.

CASE NO. 2:23-CR-00177-DC

STIPULATION TO RESET STATUS
CONFERENCE AND EXCLUDE TIME PERIODS
UNDER SPEEDY TRIAL ACT; FINDINGS AND
ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on May 15, 2025. On April 22, 2025, for purposes of equitable division and efficient and economical determination of court business, the case was reassigned to the Honorable Dena M. Coggins. ECF No. 98.

2. By this stipulation, the parties request to continue the status conference until May 16, 2025, and to exclude time between May 15, 2025, and May 16, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes 378,000 pages of both protected and unprotected discovery such as investigative reports and audio/video files. All of this discovery has been either produced directly to counsel and/or

made available for inspection and copying.

b) Counsel for defendant desire additional time review the discovery, develop the case, conduct investigation, consult with their client, discuss legal strategies, and to explain the potential consequences and possible sentencing ramifications.

c) Counsel for defendant believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 15, 2025 to May 16, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 23, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ JESSICA DELANEY
JESSICA DELANEY
Assistant United States Attorney

1 Dated: April 23, 2025

/s/ KRESTA DALY

KRESTA DALY

Counsel for Defendant

Bradley Earl Reger

4 **ORDER**

5 The court, having received, read and considered the parties' stipulation and good cause
6 appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Status Conference scheduled
7 for May 15, 2025, before Chief District Judge Troy L. Nunley is VACATED and RESET for May 16,
8 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period of May 15,
9 2025 to May 16, 2025, inclusive, is deemed excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
10 [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of
11 the public and the defendants in a speedy trial.
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16 IT IS SO ORDERED.

17 Dated: April 24, 2025



Dena Coggins

United States District Judge